



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

December 19, 2012

Ms. Peri Suenram
Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, Montana 59725

Re: CEQ # 20120371; Beaverhead-Deerlodge National Forest
Land and Resource Management Plan Final Supplemental
EIS to Comply with District of Montana Court Order

Dear Ms. Suenram:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Supplemental Environmental Impact Statement (FSEIS) for the Beaverhead-Deerlodge National Forest's Land and Resource Management Plan to Comply with District of Montana Court Order in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The EPA provided brief comments (dated August 16, 2012) on the Draft SEIS stating that snowmobile use along routes designated as exceptions to winter, non-motorized areas in the Forest Plan were unlikely to exceed either National or Montana Ambient Air Quality Standards, and any snowmobile air pollutant emissions would be localized and temporary. We also noted that impacts to soil and vegetation from snowmobile use would be buffered by snow, and water quality degradation from human waste and petroleum products did not appear likely to occur. In addition our comments noted that wildlife habitat, wildlife disturbances and/or conflicts with recreationists using adjacent winter, non-motorized areas appeared to be limited, and that the 2009 Forest Plan increased non-motorized winter allocations across the Forest (i.e., from 6% to 39%), and increased the forest-wide percent of big game winter range closed to motorized use from 26% to 43%.

Accordingly EPA did not identify any potential environmental impacts associated with the snowmobile route designations that required substantive changes to the proposal, and EPA rated the DSEIS as Category LO (Lack of Objections). We note, however, that these brief EPA comments on the DSEIS were not identified in FSEIS Appendix C showing comments and responses on the DSEIS. It is, thus, not clear if EPA's DSEIS comments were ever received by the Beaverhead-Deerlodge National Forest. Please let us know if we should send another copy of these DSEIS comments to you in case the earlier EPA comments did not reach the Beaverhead-Deerlodge National Forest for some reason. We suggest that the final project record include EPA's DSEIS comments. We have no objections to the Beaverhead Deerlodge Land and Resource Management Plan's application of minimization criteria to specific designated snowmobile routes.

The EPA appreciates the opportunity to review and comment during the NEPA process. If you have any questions please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at 406-457-5022 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie A. DalSoglio", with a stylized flourish at the end.

Julie A. DalSoglio
Director
Montana Office

Cc: Suzanne Bohan/Judy Roos, EPA 8EPR-N, Denver